

law, that violated Plaintiff's Fourth Amendment right not to be subjected to an unreasonable seizure by using excessive force?

☒ YES
☐ NO

If you answered Yes to Question 2a, proceed to Question 2b.

If you answered No to Question 2a, but Yes to Question 1a and b, proceed to Question 3. If you answered No to Question 2a, and No to Question 1a or b, proceed to Question 4.

- b. Did Defendant Cameron Duecker's act, described in Question 2a above, cause injury to Plaintiff?

☒ YES
☐ NO

Proceed to Question 3.

3. Please state the amount that will fairly compensate the Plaintiff for any injury she sustained as a result of Defendant Cameron Duecker's conduct described in Questions 1 and/or 2 above. If you find liability and causation for any of the above, but do not find compensatory damages should be awarded, you may award nominal damages in the amount of \$1.00.

Answer: \$50,000
 (Fill in Dollar Figure)

Proceed to Question 4.

Plaintiff's Claims against RCSD
under the South Carolina Tort Claims Act

4. Do you unanimously find that Plaintiff has proved, by a preponderance of the evidence, that Duecker was grossly negligent when he entered Plaintiff's home, arrested, and imprisoned her?

☒ YES
☐ NO

Proceed to Question 5.

5. Do you unanimously find that Plaintiff has proved, by a preponderance of the evidence, that Duecker committed assault against Plaintiff?

☒ YES
☐ NO

Proceed to Question 6.

6. Do you unanimously find that Plaintiff has proved, by a preponderance of the evidence, that Duecker committed battery against Plaintiff?

☒ YES
☐ NO

Proceed to Question 7.

7. Do you unanimously find that Plaintiff has proved, by a preponderance of the evidence, that Duecker falsely imprisoned Plaintiff?

☒ YES
☐ NO

If you answered Yes to any of Questions 4-7, please proceed to Question 8. If you answered No to all of Questions 4-7, please proceed to Question 11.

8. Do you unanimously find that Plaintiff has proved, by a preponderance of the evidence, that Duecker's actions in any of Questions 4-7 were a proximate cause of Plaintiff's injuries?

☒ YES
☐ NO

If you answered Yes to Question 8, please proceed to Question 9. If you answered No to Question 8, please proceed to Question 11.

9. Please state the amount that will fairly compensate Plaintiff for any injury she sustained as a result of Duecker's conduct as described in Questions 4-7.

Answer: \$500,000
(Fill in Dollar Figure)

If you awarded Plaintiff damages in Question 9, please proceed to Question 10. If you did not award damages in Question 9, please proceed to Question 11.

10. RCSD's Affirmative Defenses.

- a. Do you find that Defendant RCSD has proved, by a preponderance of the evidence, that Duecker's conduct in this incident was outside of the scope of his official duties?

____ YES
☒ NO

Proceed to Question 10b.

- b. Do you find that Defendant RCSD has proved, by a preponderance of the evidence, that Duecker's conduct in this incident constituted actual malice?

____ YES
☒ NO

Proceed to Question 10c.

- c. Do you find that Defendant RCSD has proved, by a preponderance of the evidence, that Duecker's conduct in this incident constituted an intent to harm?

____ YES
☒ NO

Proceed to Question 11.

11. Negligence in retention or supervision.

- a. Do you unanimously find that Plaintiff has proved, by a preponderance of the evidence, that Defendant RCSD was negligent in retaining and/or supervising Duecker?

____ YES
☒ NO

If you answered Yes to Question 11a, proceed to Question 11b. If you answered No to Question 11a, your deliberations are complete. Please have the foreperson sign the verdict form.

- b. Do you unanimously find that Plaintiff has proved, by a preponderance of the evidence, that Defendant RCSD's negligent retention and/or or supervision of Duecker was a proximate cause of Plaintiff's injuries?

____ YES
____ NO

If you answered yes to question 11b, please proceed to Question 11c. If you answered No to Question 11b, your deliberations are complete. Please have the foreperson sign the verdict form..

- c. Please state the amount that will fairly compensate Plaintiff for any injuries she sustained as a result of RCSD's conduct as described in Question 11a.

Answer: _____
(Fill in Dollar Figure)

If you awarded damages for state law claims in Questions 9 and 11c, please proceed to Question 12. If you did not award damages in either Questions 9 or 11c, your deliberations are complete. Please have the foreperson sign the verdict form.

12. Please state the number of occurrences you find Plaintiff has proven.

Answer: _____

Your deliberations are now complete. Please have the foreperson sign the verdict form.

January 12, 2023
Columbia, South Carolina



Foreperson



Print Name